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**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
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August 13, 2024

**Via ECF**

The Honorable Valerie Figueredo  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1660  
New York, New York 10007

Re: *Shellyne Rodriguez v. The City of New York et al.* (21-cv-10815)(PKC)(VF)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, and serve as counsel to the defendants in the above-referenced matter. Defendants write to request an extension of time to respond to plaintiff's two motions (Dkt. Nos. 95 and 98) from August 15 to Sunday, August 18, 2024. Plaintiff's counsel, Remy Green, consents to this request. This is the City's first request for an extension to respond to Dkt. No 98, and the City's second request for an extension to respond to Dkt. No. 95.

The reason for the request is that I was recently assigned this matter on Friday evening, and will need additional time to review all the issues involved, and to respond to the motions. The undersigned will make every effort to file its responses before August 18, 2024. However, the City's request does not affect any other deadlines, including the conference scheduled for Monday, August 19, 2024. The City apologizes for the lateness of this request.

For the foregoing reasons, defendant City respectfully requests that this Court grant an extension of time to respond to the plaintiff's motions from August 15, 2024 to August 18, 2024.

Thank you for your time and attention to this matter.

Respectfully submitted,

Joseph M. Hiraoka, Jr. /s

Senior Counsel  
Special Federal Litigation Division

cc: All Counsel